

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**UNITED STATES OF AMERICA** )  
 )  
 **V.** )  
 )  
 **IAN FREEMAN,** )  
 **Defendant** )

**Court No. 1:21-cr-00041-JL**

**GOVERNMENT’S NOTICE OF INTENT TO PRESENT EVIDENCE**  
**ELECTRONICALLY PURSUANT TO LCrR 83.16 AND 16.1(h)**

The United States of America, by and through Jane E. Young, United States Attorney for the District of New Hampshire, and Assistant United States Attorneys Georgiana L. MacDonald, John J. Kennedy, and Seth R. Aframe, request the court to permit the jury to view all evidence presented at trial using the court's Jury Electronic Review System (JERS) during their deliberations in accordance with Local Criminal Rule 83.16.

The government also states its intention to present its evidence electronically during its case-in-chief at trial in accordance with Local Criminal Rule 16.1(h). The evidence presented will include; but not limited to, digital images, audio and video recordings, emails, charts, proprietary player files, and Microsoft Excel spreadsheets. The digital evidence will be presented through the government's laptop utilizing trial presentation software. The government may utilize the court's document camera should the need arise during trial.

The government will show witnesses physical evidence seized during a search warrant, such as the defendant's laptop and papers, all of which are contained in the original FBI evidence bags.

The government requests that the jury be permitted to utilize transcript binders as an aid should the need arise during witness testimony.

The government will provide the court with marked and unmarked exhibits in accordance with

Local Criminal Rule 83.16(b) on two (2) encrypted thumb drives and will also provide the court with printed and stickered exhibits should the jury prefer to review the paper documents.

The government has conferred with Mark Sisti, counsel for defendant Ian Freeman, who does not assent to the motion at this time.

Respectfully submitted,

JANE E. YOUNG  
United States Attorney

Date: November 25, 2022

By: /s/ Georgiana L. MacDonald  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Government's Notice of Intent to Present Electronically was this date served electronically through ECF, to Attorney Mark L. Sisti, counsel for Ian Freeman, defendant.

Date: November 25, 2022

By: /s/ Georgiana L. MacDonald  
Georgiana L. MacDonald  
Assistant United States Attorney